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Tue, Jun 10, 12:22 PM

to Nicole, Eduardo, Danielle, Nicole, Patrick, Luis, Molly ▼ Ty Clarke <tclarke@lawyersftp.com>

Hi Nicole and Eduardo,

While we believe the case law supports taking the Defendant Officers' depositions in Fresno, in light of Judge Grosjean's statements today, we are open to taking the depositions in Porterville. We of course would still be willing to take them in Fresno as well.

Can you let us know how you would like to proceed? If it is still your position that these depositions must be taken remotely, we should move forward with the informed discovery conference proceedings that Judge Grosjean discussed today.

Thanks,